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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
11 HANIEH SIGARI, an individual;) Case No: 5:24-CV-01816-EJD
12 QYRAL, LLC, a California Limited)
Liability Company,) [PROPOSED] ORDER
13 Plaintiffs,) APPOINTING LIMITED
) PURPOSE RECEIVER KEVIN SINGER
14)
15 v.)
16)
17 DARIUSZ BANASIK, an individual;)
Does 1-10,)
18 Defendants;)
19)
20 SHOPIFY (USA) INC., a Delaware)
Corporation; GOOGLE LLC, a Delaware)
21 Limited Liability Company;)
GODADDY.COM, LLC, a Delaware)
22 Limited Liability Company; METRICS)
GLOBAL, INC., a Nevada Corporation;)
RECHARGE INC., a Delaware)
23 Corporation,)
24 Nominal Defendants.)
25 _____)

1 ORDER

2 On April 10, 2024, Defendant filed an Emergency Ex Parte Application for Receivership of
3 Qyral, LLC. The Court considered the application as well as Plaintiffs' partial opposition and
4 indicated that Mr. Kevin Singer would be appointed a Limited Purpose Receiver. The parties
5 were ordered to meet and confer and file a proposed order by 3 p.m. on April 12, 2024. Plaintiffs'
6 counsel indicates he reached out several times to Defendant's counsel and did not receive a
7 response. Accordingly, the Court appoints Mr. Singer Limited Purpose Receiver under the
8 following terms proposed by Plaintiff:

9 The Receiver is empowered to do all of the following at this time:

10 1. Receive, manage, and hold funds for the benefit of Qyral, LLC by third parties such as
11 Metrics Global, Inc. and Recharge, Inc., and any other later-discovered third parties who
12 hold funds of Qyral, LLC;

13 2. Maintain, coordinate, and pay invoices to company vendors;

14 3. Manage and disburse company remittances;

15 4. Negotiate and compromise terms with vendors on the company's behalf;

16 5. Manage the company's online accounts, domain name, and email system;

17 6. Such other relief as the Parties stipulate to, or further ordered by the court.

18 7. Adjust, fix, or set compensation for any company personnel, including Plaintiff Ms. Sigari.

19 Other orders:

20 _____
21 _____
22 _____
23 _____
24 _____

25 Date: April 12, 2024

26 By: _____

27 Hon. Edward J. Davila
U.S. District Judge